

RM-10620 should be denied for the following reasons:

1. Current FCC regulations provide for upgrading an Amateur Radio Operator's License with a minimum of effort. Further concessions are not necessary.
2. Certification of 20 years of operation by the FCC is a concept that is fraught with opportunities for abuse. The FCC has already demonstrated that it is extremely difficult, if not impossible, to document the licensing history of all Amateur Radio Operators.